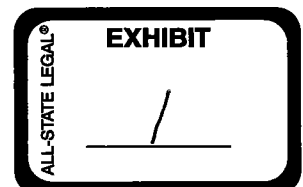


<p>Page 1</p> <p>1 UNITED STATES DISTRICT COURT 2 SOUTHERN DISTRICT OF OHIO 3 WESTERN DIVISION</p> <p>4 UNITED STATES OF AMERICA, : 5 Plaintiff : 6 -vs- : CASE NO. C-1-00-637 7 DANIEL GREEN, et al., : 8 Defendants : 9</p> <p>10 Deposition of BEVERLY ROBIN GRINSTEAD, a 11 witness herein, taken by the plaintiff as upon 12 direct examination pursuant to the Federal Rules of 13 Civil Procedure and pursuant to agreement among 14 counsel as to time and place and stipulations 15 hereinafter set forth, at the Offices of the United 16 States Attorney, 221 East Fourth Street, Suite 400, 17 Cincinnati, Ohio, at 9:00 a.m., on Tuesday, January 18 8, 2002, before Pamela S. Giglio, a notary public 19 within and for the State of Ohio. 20 21</p> <p>22 GIGLIO REPORTING SERVICES 23 3 Cypress Garden Cincinnati, Ohio 45220 (513) 861-2200</p>	<p>Page 2</p> <p>1 APPEARANCES:</p> <p>2 On behalf of the Plaintiff:</p> <p>3 JEFFREY A. SPECTOR, ESQ. 4 of 5 U.S. DEPARTMENT OF JUSTICE 6 ENVIRONMENT & NATURAL RESOURCES DIVISION 7 ENVIRONMENTAL ENFORCEMENT SECTION 8 P.O. Box 7611 9 Ben Franklin Station Washington, D.C., 20044-7611</p> <p>10 On behalf of Daniel Green, Sandra Green, 11 and L.W.G. Co., Inc. f/k/a Green Industries, 12 Inc.</p> <p>13 DAVID A. OWEN, ESQ. 14 of 15 GREENEBAUM DOLL & McDONALD, PLLC 16 333 West Vine Street 17 Suite 1400 Lexington, Kentucky, 40507</p> <p>18 For the Estate of Maurice Green:</p> <p>19 DAVID J. SCHMITT 20 of 21 CORS & BASSETT, LLC 22 537 East Pete Rose Way 23 Suite 400 Cincinnati, Ohio, 45202-3502</p> <p>Also Present: DANIEL GREEN KENNETH ROWE</p>
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<p>Page 3</p> <p>1 S T I P U L A T I O N S</p> <p>2 It is stipulated by and among counsel for</p> <p>3 the respective parties that the deposition of</p> <p>4 BEVERLY ROBIN GRINSTEAD, a witness herein, may be</p> <p>5 taken at this time by the plaintiff as upon direct</p> <p>6 examination pursuant to the Federal Rules of Civil</p> <p>7 Procedure and pursuant to Subpoena and Notice of</p> <p>8 Deposition; that the deposition may be taken in</p> <p>9 stenotype by the notary public-court reporter and</p> <p>10 transcribed by her out of the presence of the</p> <p>11 witness; that the transcribed deposition is to be</p> <p>12 submitted to the witness for her examination and</p> <p>13 signature, and that signature may be affixed out of</p> <p>14 the presence of the notary public-court reporter. 15</p>	<p>Page 4</p> <p>1 E X H I B I T S</p> <table><thead><tr><th>Deposition Exhibits:</th><th>Marked for ID</th></tr></thead><tbody><tr><td>No. 21 Document put together by Robin Grinstead</td><td>43</td></tr><tr><td>No. 22 Fax cover page plus Vehicle Purchase Contract and related documents</td><td>44</td></tr><tr><td>No. 23 February Phone Notes</td><td>56</td></tr><tr><td>No. 24 Handwritten Phone Log</td><td>56</td></tr><tr><td>No. 25 Handwritten Phone Log</td><td>56</td></tr><tr><td>No. 26 Typewritten log dated Jan.-February 1989</td><td>56</td></tr><tr><td>No. 27 Copies of Things to do Today notes</td><td>56</td></tr><tr><td>No. 28 Norwood Hard Chrome General Ledger Run Date 2-15-91</td><td>70</td></tr><tr><td>No. 29 LWG Finishing General Ledger Run Date 2-10-92</td><td>70</td></tr><tr><td>No. 30 LWG Company, Inc. General Ledger Run Date 2-15-91</td><td>70</td></tr><tr><td>No. 31 LWG Company, Inc. General Ledger Run Date 2-10-92</td><td>70</td></tr><tr><td>No. 32 Profit & Loss Monthly for Norwood Hard Chrome</td><td>74</td></tr><tr><td>No. 33 Norwood Hard Chrome Income State Period Ending 10-31-89</td><td>81</td></tr><tr><td>No. 34 Norwood Hard Chrome Income Statement Period Ending 4-30-92</td><td>81</td></tr><tr><td>No. 35 LWG Finishing Company Income Statement Period Ending 10-31-91</td><td>81</td></tr><tr><td>No. 36 Norwood Hard Chrome Income Statement Period Ending 10-31-90</td><td>81</td></tr><tr><td>No. 37 HST/LWG Finishing Income Statement Period Ending 8-31-94</td><td>81</td></tr><tr><td>No. 38 Norwood Hard Chrome 1989 Deposits</td><td>87</td></tr></tbody></table>	Deposition Exhibits:	Marked for ID	No. 21 Document put together by Robin Grinstead	43	No. 22 Fax cover page plus Vehicle Purchase Contract and related documents	44	No. 23 February Phone Notes	56	No. 24 Handwritten Phone Log	56	No. 25 Handwritten Phone Log	56	No. 26 Typewritten log dated Jan.-February 1989	56	No. 27 Copies of Things to do Today notes	56	No. 28 Norwood Hard Chrome General Ledger Run Date 2-15-91	70	No. 29 LWG Finishing General Ledger Run Date 2-10-92	70	No. 30 LWG Company, Inc. General Ledger Run Date 2-15-91	70	No. 31 LWG Company, Inc. General Ledger Run Date 2-10-92	70	No. 32 Profit & Loss Monthly for Norwood Hard Chrome	74	No. 33 Norwood Hard Chrome Income State Period Ending 10-31-89	81	No. 34 Norwood Hard Chrome Income Statement Period Ending 4-30-92	81	No. 35 LWG Finishing Company Income Statement Period Ending 10-31-91	81	No. 36 Norwood Hard Chrome Income Statement Period Ending 10-31-90	81	No. 37 HST/LWG Finishing Income Statement Period Ending 8-31-94	81	No. 38 Norwood Hard Chrome 1989 Deposits	87
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1 Q. Why did you leave the company?
 2 A. Because I was caught using the
 3 credit cards is originally how it started.
 4 Q. Were you fired?
 5 A. Yes.
 6 Q. Were there legal actions taken
 7 because of your use of the Green company credit
 8 cards?
 9 A. Yes.
 10 Q. Civil or criminal actions?
 11 A. Criminal.
 12 Q. What was the result of that?
 13 A. I'm still on probation.
 14 Q. So you were convicted?
 15 A. Yes.
 16 Q. What was the penalty?
 17 A. Five years probation, 200 hours of
 18 community service and I had to pay back the
 19 company.
 20 Q. You said you are still on probation?
 21 A. Right.
 22 Q. When does that run out?
 23 A. Next October.
 24 Q. Did you perform the community
 25 service?

*** Notes ***

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1 A. I did hundred 229 hours. I liked
 2 it. It was for the Red Cross.
 3 Q. Have you paid back the company?
 4 A. I am still paying them back.
 5 Q. How much do you have to pay them
 6 back?
 7 A. \$500 a month.
 8 Q. Do you know when that will cease?
 9 A. We go back to Court after my
 10 probation then we are to work it out. The funds
 11 are to go to the EPA as far as I understand. They
 12 don't go to Dan Green or to the company. It goes
 13 back to the EPA.
 14 Then at the time, at the end of my
 15 probation, I go to the judge again to work out pay
 16 arrangements for the remainder.
 17 Q. Do you have a rough idea of how much
 18 you have paid off?
 19 A. Probably close to \$50,000.
 20 Q. After you left the Greens did you
 21 get another job?
 22 A. Yes.
 23 Q. Who were you employed by then?
 24 A. I was still running with the
 25 Sharonville life squad. But I had a baby, too and

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1 I quit working for about a year and a half.
 2 Q. What is the Sharonville life squad?
 3 A. Fire department.
 4 Q. When did you start working with
 5 them?
 6 A. On goodness. '95.
 7 Q. So immediately after you left the
 8 Greens?
 9 A. I was doing that, too, in the
 10 evenings.
 11 Q. Did you go full time afterwards or
 12 did you stay working with the fire department in
 13 the evenings?
 14 A. Just stayed in the evenings and on
 15 weekends.
 16 Q. Then you said you took some time off
 17 for your child?
 18 A. Right.
 19 Q. What was that approximately?
 20 A. Well, let's see, she was born -- I
 21 quit working for them in '96 probably.
 22 Q. Since then have you had any new
 23 employment?
 24 A. Yes. I work for Sibcy Cline
 25 Financial for two years then Midland Title a year

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1 in February.
 2 Q. What was the first company?
 3 A. Sibcy Cline Financial.
 4 Q. What did you do for them?
 5 A. Loan officer.
 6 Q. What is their business?
 7 A. They give mortgage loans.
 8 Q. Who do you work for currently?
 9 A. Midland Title Security.
 10 Q. What do you do?
 11 A. Title, marketing rep, sales
 12 marketing rep.
 13 Q. Are they a title insurance company?
 14 A. Yes.
 15 Q. When we were discussing your job
 16 history you mentioned a couple different companies
 17 so I'll go through a list of these companies and
 18 have you explain a little about them the best that
 19 you can.
 20 First off, are you aware of a
 21 company called Green Industries, Inc. owned by the
 22 Greens on Kemper Road?
 23 A. Yes.
 24 Q. Did you ever work at the Kemper Road
 25 facility?